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April 11, 2019

VIA ECF

The Honorable Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, New York 10007
(212) 805-0183

Re: Mercer v. 206 West Hotel LLC, a New York Corporation
Docket No. 1:19-cv-01956-VSB

Dear Judge Broderick:

Our firm represents Defendant 206 West Hotel LLC (“Defendant”) in the above-referenced matter. We write pursuant to Section G. of your Individual Rules and Practices to request a thirty (30) day extension of time to respond to the Complaint, until Monday, May 13, 2019.

The original deadline to respond to the Complaint was April 9, 2019. This is our first request for an extension of time to respond to the Complaint. We spoke to Plaintiff’s counsel, Nolan Klein, who consents to this extension. We seek this extension of time as we were just retained as counsel and need time to familiarize ourselves with the case.

Thank you for your consideration of our request.

Very truly yours,

/s/ Heidi M. Gootnick

Heidi M. Gootnick

cc: All counsel of record (via ECF)

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on April 11, 2019. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Dated: April 11, 2019

/s/ Heidi Gootnick
Heidi Gootnick